

**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
847 NW Hwy 191
Helper, Utah 84526
(435) 472-0475
Fax: (435) 472-4780

An affiliate of **RAG**

August 15, 2000

RECEIVED

AUG 18 2000

**DIVISION OF
OIL, GAS AND MINING**

Ms. Susan White
Utah Division of Oil, Gas and Mining
1594 West North Temple, STE. 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Incoming

RE: Response to Findings for Raptor Monitoring, Plateau Mining Corporation, Star Point Mine, ACT/007/006-AM00B, Outgoing File, Carbon County, Utah

Dear Ms. White:

Plateau Mining Corporation (PMC) is submitting revisions to its Star Point Mine Permit to address the Division's Technical Analysis regarding the discontinuance of raptor monitoring. PMC made its best attempt to update Table 322.200f, Raptor Nest Sites Activity, to correct and reflect data accumulated during the 17 years of raptor monitoring.

Raptor monitoring has come a long way from sighting a nest, locating it on a map, and identifying the species. Today, surveys are performed with the assistance of qualified biologists, utilize slow moving aircraft (helicopters), and coordinates determined by global positioning systems. This takes the guesswork out of trying to place a dot and number on a 1":2000' topographical map and wondering if it is a raven or a redtail hawk nest. Let alone the nausea one is experiencing.

Even with the shortcomings of the old methods, PMC believes that mining's influence on territorial nests within and adjacent to its Star Point Mine were insignificant, if at all. A good example would be the underground mining in Section 18, T15S, R8E, where the fencing of two golden eagle nests and subsidence of the sandstone cliff face had an insignificant affect on the eagle pair.

Mr. J. William Bates and Mr. Miles O. Moretti conducted a research project that discussed and evaluated the impacts to this nesting territory and found that the territory produced 2 of 4 years before and 2 of 4 years after the nests were fenced. Furthermore, from subsequent surveys, this territory produced 3 of 7 years after the study.

PMC believes that thanks to its efforts and the efforts of other mines in Carbon and Emery Counties, invaluable data has been and continues to be gathered that will aid in the research regarding raptor responses to human activities and land use.

Ms. Susan White
August 15, 2000
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PMC is submitting 2 copies to the Salt Lake Office, and 1 copy to the Price Field Office. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Pappas', written in a cursive style.

Johnny Pappas
Sr. Environmental Engineer

Enclosures

File: Star Point Mine- Raptors
Chrono: JP000803.ltr

APPLICATION FOR PERMIT CHANGE

Title of Change: Response to Findings for Raptor Monitoring, Plateau Mining Corporation,
Star Point Mine, ACT/007/006-AM00B

Permit Number: ACT/007/006

Mine: Star Point

Permittee: Plateau Mining Corp.

Description, include reason for change and timing required to implement:

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application changed as a result of Division Order? D.O. # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside the Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does application require or include public notice publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	19. Does application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

X Attach 2 copies of the application for the Salt Lake Office, one copy will be delivered to the Price Field Office.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

Signed: JOHNNY PAPPA - Sr. Env. Engineer - 8/16/00
Name - Position - Date

Subscribed and sworn to before me this 16 day of Aug, 2000.
by Jackie B. Bogden
Public

My Commission Expires: _____
Attest: STATE OF
COUNTY OF

UT
CARBON



Received by Oil, Gas & Mining

RECEIVED

AUG 18 2000

**DIVISION OF
OIL, GAS AND MINING**

ASSIGNED TRACKING NUMBER

Application for Permit Change

Detailed Schedule of Changes to the Permit

Title of Change: Response to Findings for Raptor Monitoring , Plateau Mining

Permit Number: ACT/007/006

Corporation, Star Point Mine, ACT/007/006-AM00B

Mine: Star Point Mine

Permittee: Plateau Mining Corp.

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit change. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the exiting mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 3, R645-301-300 - Table of Contents
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 3, R645-301-300 - Pages 300-31 through 300-44
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 322.200a, Table 322.200f - Pages 21 and 22
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 322.200a, Report entitled "GOLDEN EAGLE POPULATION ECOLOGY IN EASTERN UTAH"
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 322.210a, Correspondence pertaining to raptors between PMC and DWR.
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

We are aware that the text and exhibit pages are double-sided. Once the submittal is approved we will double-side the pages to fit into the currently approved permit.

August 16, 2000